

Lessard-Sams Outdoor Heritage Council

Laws of Minnesota 2018 Accomplishment Plan

General Information

Date: 03/17/2021

Project Title: Accelerating the Wildlife Management Area Program - Phase X

Funds Recommended: \$5,740,000

Legislative Citation: ML 2018, Ch. 208, Art. 1, Sec. 2, subd 2(b)

Appropriation Language: \$5,740,000 the second year is to the commissioner of natural resources for an agreement with Pheasants Forever to acquire in fee and restore lands for wildlife management under Minnesota Statutes, section 86A.05, subdivision 8. Subject to evaluation criteria in Minnesota Rules, part 6136.0900, priority must be given to acquiring lands that are eligible for the native prairie bank under Minnesota Statutes, section 84.96, or lands adjacent to protected native prairie. A list of proposed land acquisitions must be provided as part of the required accomplishment plan.

Manager Information

Manager's Name: Eran Sandquist **Title:** State Coordinator - MN

Organization: Pheasants Forever, Inc. **Address:** 410 Lincoln Ave South PO Box 91

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Location Information

County Location(s): Renville, Nobles, Fillmore, Rock, Watonwan, Swift, Wright, Chippewa, Jackson, Murray, Stearns, Big Stone, Lac qui Parle, Meeker, Faribault, Lyon, Yellow Medicine, Cottonwood, Sibley, Grant, McLeod, Redwood, Steele, Washington, Mower, Carver, Douglas, Martin and Kandiyohi.

Eco regions in which work will take place:

- Forest / Prairie Transition
- Prairie
- Metro / Urban

Activity types:

• Protect in Fee

Priority resources addressed by activity:

- Wetlands
- Prairie

Narrative

Abstract

This proposal accelerates the protection of 1,030 acres of strategic prairie grassland, wetland, and other wildlife habitats as State Wildlife Management Areas (WMA) open to public hunting. Pheasants Forever (PF) will be acquiring tracts that build onto or create a corridor between existing protected lands which will be transferred to the MN Department of Natural Resources (MN DNR) to be included as a WMA. All acquisitions will occur within the prairie, prairie/forest transition, and metro planning regions. These areas have seen the greatest decline in upland and wetland habitat.

Design and Scope of Work

Pressures from development, industry, and agriculture continue to mount on wildlife habitat within the farmland regions of Minnesota. In fact, despite our collective investments in conservation, many of the agricultural counties in Minnesota are continuing to experience a net loss of wildlife habitat. This unfortunate reality is exacerbated by the conversion of lands expiring out of CRP. In the next four years, Minnesota's agricultural landscape is set to experience a loss of over 500,000 acres due to expiration out of CRP. This equates to roughly a 20% loss of our grassland habitat necessary for pheasants, ducks, and the suite of grassland species that call Minnesota home. Now, more than ever, it is time to accelerate our investments in permanently protected high-quality habitat complexes that will protect, sustain, and increase Minnesota's wildlife populations. Providing public habitat for Minnesotans to hunt, trap, fish and otherwise recreate in the outdoors are urgent needs for Minnesota's growing citizenry. Access to the outdoors is fundamental to ensuring Minnesota's outdoor heritage is passed on to future generations. In addition, these public areas help bolster the economy as hunters in Minnesota support over 12,400 jobs and spend \$733 million annually.

To help slow and reverse the loss of habitat and declining wildlife populations, PF and our partners will protect (fee acquisition from willing sellers) 1,030 acres of high priority grassland (native prairie if available), wetland, and wildlife habitat as WMAs throughout the pheasant range of Minnesota. PF is striving to build landscape-level habitat complexes that will protect and sustain wildlife populations. Many of the potential projects are additions to existing WMAs which were originally acquired in partnership with MNDNR, local PF chapters, and conservation partners.

Projects were developed and selected in conjunction with local and regional DNR staff. All projects will meet standards and requirements for inclusion into the WMA system and DNR Commissioner approval will be received for any project funded under this proposal. In addition to meeting the minimum WMA standards, additional criteria are used to develop the potential project list including: 1) Does the parcel contain habitat restoration potential that will result in an increase in wildlife populations? 2) Does the parcel build upon existing investments

in public and private land habitat (landscape scale significance)? 3) Does the parcel contain significant natural communities or will it protect or buffer significant natural communities? 4) Does the parcel have the potential and focus on habitat protection and restoration in the future? 5) Does the parcel provide multiple benefits (recreation, access, water control, water quality, wellhead protection, lakeshore, local community support, etc.)?

Providing high-quality habitat and keeping future management concerns in mind, all acquisitions will be restored and/or enhanced to as high quality as practicable, with the belief that quality and comprehensive restorations utilizing native species result in lower management costs. Acquired croplands will be permanently retired and restored to diverse grasslands and wetlands habitat. Restorations will also consider the needs of the monarch butterfly and native prairie.

How does the plan address habitats that have significant value for wildlife species of greatest conservation need, and/or threatened or endangered species, and list targeted species?

PF is actively engaged in conservation priority planning meetings with local, state & government agencies, SWCDs, nonprofits, and other stake holders to determine what areas are the highest priority for adding more permanently protected lands in the prairie, prairie/forest transition, and metro planning areas. Focus areas are identified by finding places with an urgency to permanently protect habitat that include factors such as: 1) rare, threatened, & endangered species in an area that are on the decline; 2) are we losing a habitat type at a high rate due to invasive tree encroachment which will cause a subsequent decline of the wildlife species in that area; 3) can we strategically build wildlife habitat while also protecting water resources such as wellhead protection areas. Asking questions like these help drive PF's priorities. Priority is also given to restoring marginal farmland that have highly erodible land and drained wetlands. Sellers often say that the lands we are acquiring should have never been farmed, citing that in many years, that farming was not profitable for them. Building new habitat around existing permanently protected complexes also reverses the number one threat to all of Minnesota's wildlife species, fragmentation. When selecting projects for this proposal PF uses GIS layers and works with DNR staff to identify rare, threatened and endangered species that occur on or near a project. Species of greatest conservation need are also considered and influence restoration plans after the land is permanently protected. The aim is to increase functionality and productivity of grassland landscapes for these species (e.g. Grassland Bird Conservation Area Concept) to maximize quality habitat for important wildlife species. Restoration of wetland and high diversity grassland complexes will provide habitat for a myriad of species including waterfowl, black terns, bobolinks, meadowlarks, ring-necked pheasants, pollinators and monarchs. Other species of concern benefiting from this project include the prairie chicken, short-eared owl, marsh hawk, and yellow rails.

Describe how the plan uses science-based targeting that leverages or expands corridors and complexes, reduces fragmentation or protects areas identified in the MN County Biological Survey:

This proposal utilizes the best science and modeling available to build or expand corridors and complexes. To scale this large programmatic grant to local landscape level priorities, PF works in close collaboration with the local area managers of the MN DNR, USFWS, and other Minnesota partners. In addition, we use SWAAT scores to build on existing grassland and wetland conservation efforts in a science-based approach. This proposal will continue to leverage spatial data and the power of GIS to identify acquisitions based on landscape level priority areas. Preference is given to project sites that help deliver the goals of other recognized conservation initiatives and plans. Data layers (i.e. MN Biological Survey, Natural Heritage Database, MN Prairie Plan, Wellhead Protection Areas, HAPET Scores, Pheasant Action Plan, existing protected land, etc.) will be used to help justify projects and focus areas as well as to inform decisions when allocating scarce dollars for habitat protection, restoration and enhancement. If there are species of concern located on or adjacent to project tracts as identified in the MBS layer,

we take an extra consideration when developing proposals and this ultimately may change the way we evaluate and prioritize project tracts. In addition, if there are rare or sensitive species on site we will be able to identify those, communicate with the appropriate long-term land managers, and ensure we're having a positive impact on these species.

Which two sections of the Minnesota Statewide Conservation and Preservation Plan are most applicable to this project?

- H1 Protect priority land habitats
- H5 Restore land, wetlands and wetland-associated watersheds

Which two other plans are addressed in this program?

- Minnesota Prairie Conservation Plan
- Minnesota's Wildlife Management Area Acquisition The Next 50 Years

Which LSOHC section priorities are addressed in this program?

Forest / Prairie Transition

Protect, enhance, and restore wild rice wetlands, shallow lakes, wetland/grassland complexes, aspen
parklands, and shoreland that provide critical habitat for game and nongame wildlife

Metro / Urban

• Protect, enhance, and restore remnant native prairie, Big Woods forests, and oak savanna with an emphasis on areas with high biological diversity

Prairie

 Protect, enhance, or restore existing wetland/upland complexes, or convert agricultural lands to new wetland/upland habitat complexes

Does this program include leveraged funding?

-

Non-OHF Appropriations

Year	Source	Amount
Annual	PF	150,000

How will you sustain and/or maintain this work after the Outdoor Heritage Funds are expended?

All lands will be enrolled into the state Wildlife Management Area system and will be managed in perpetuity by the Minnesota DNR. All acquired lands will meet the minimum initial development standards for WMAs. All acquisitions will be restored and/or enhanced to as high quality as practicable, with the knowledge that quality and comprehensive restorations utilizing native species result in lower management costs. In addition, our local PF chapter members and volunteers maintain a high interest in seeing the habitat and productivity of acquired parcels are at high-quality levels. PF and partners, including the DNR and USFWS, will develop an ecological restoration and management plan for each parcel. Grant and partner dollars will also be used for the initial site development and restoration/enhancement work.

Actions to Maintain Project Outcomes

	Year	Source of Funds	Step 1	Step 2	Step 3
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Post Transfer to	MN DNR - Game and	Monitoring	Maintenance	Management
MNDNR	Fish Funds			

Activity Details

Requirements

If funded, this program will meet all applicable criteria set forth in MS 97A.056?

Yes

Will local government approval be sought prior to acquisition?

No

Describe any measures to inform local governments of land acquisition under their jurisdiction:

At a minimum, PF and/or MN DNR will notify local government in writing of the intent to acquire and donate lands to the state and follow up with questions prior to acquisition. In cases where there is interest, we will also indicate our willingness to attend or ask to attend county or township meetings to communicate our interest in the projects and seek support.

Is the land you plan to acquire (fee title) free of any other permanent protection?

No

Describe the permanent protection and justification for additional protection:

A limited number of the parcels may have a federal or state easement on a portion of the tract which provides permanent protection for wetlands or grasslands. If a parcel has one of these encumbrances, and is still deemed a high priority by the partnership, we will follow guidance established by the Outdoor Heritage Fund to proceed, or use non-state funding to acquire the residual value of the protected portion of the property.

Land Use

Will there be planting of any crop on OHF land purchased or restored in this program?

Yes

Explain what will be planted:

The primary purposes of WMAs are to develop and manage for the production of wildlife and for compatible outdoor recreation. To fulfill those goals, the DNR may use limited farming specifically to enhance or benefit the management of state lands for wildlife. This proposal may include initial development plans or restoration plans to utilize farming to prepare previously farmed sites for native plant seeding. This is a standard practice across the Midwest to prepare the seedbed for native seed planting. In these restorations, PF's policy is to use non neonicotinoid treated seed and no herbicides other than glyphosate. On a small percentage of WMAs (less than 2.5%), DNR uses farming to provide a winter food source for a variety of wildlife species in agriculture-dominated landscapes largely devoid of winter food sources. There are no immediate plans to use farming for winter food on any of the parcels in this proposal.

Are any of the crop types planted GMO treated?

True

Is this land currently open for hunting and fishing?

No

Will the land be open for hunting and fishing after completion?

Yes

Describe any variation from the State of Minnesota regulations:

No Variation from State of Minnesota regulations.

Who will eventually own the fee title land?

The State of Minnesota

Are there currently trails or roads on any of the proposed acquisitions?

No

Will new trails or roads be developed or improved as a result of the OHF acquisition?

No

Timeline

Activity Name	Estimated Completion Date
Identify priority acquisitions	07/01/2018
Contract appraisals ordered	09/01/2018
Purchase agreements	02/01/2019
Re-evaluate tract priority	02/14/2019
Contract appraisals ordered	04/01/2019
Purchase agreements	09/01/2019
Close on tracts	01/01/2021
Restorations completed	06/30/2023

Date of Final Report Submission: 11/01/2023

Budget

Budget reallocations up to 10% do not require an amendment to the Accomplishment Plan.

Totals

Item	Funding Request	Antic. Leverage	Leverage Source	Total
Personnel	\$45,000	-	-	\$45,000
Contracts	\$494,500	-	-	\$494,500
Fee Acquisition w/	\$4,890,000	\$412,000	PF, federal or private	\$5,302,000
PILT			source	
Fee Acquisition w/o	-	-	-	-
PILT				
Easement Acquisition	-	-	-	-
Easement	-	-	-	-
Stewardship				
Travel	\$3,300	-	-	\$3,300
Professional Services	\$130,000	-	-	\$130,000
Direct Support	\$9,900	-	-	\$9,900
Services				
DNR Land Acquisition	\$85,000	-	-	\$85,000
Costs				
Capital Equipment	-	-	-	-
Other	-	-	-	-
Equipment/Tools				
Supplies/Materials	-	-	-	-
DNR IDP	\$82,300	-	-	\$82,300
Grand Total	\$5,740,000	\$412,000	-	\$6,152,000

Personnel

Innual FTE	Years Working	Funding Request	Antic. Leverage	Leverage Source	Total
0.06	3.0	\$20,000	-	-	\$20,000
0.06	3.0	\$15,000		-	\$15,000
0.03	3.0	\$10,000	1	-	\$10,000
	0.06	0.06 3.0 0.06 3.0	0.06 3.0 \$20,000 0.06 3.0 \$15,000	0.06 3.0 \$20,000 - 0.06 3.0 \$15,000 -	0.06 3.0 \$20,000 - - 0.06 3.0 \$15,000 - -

Amount of Request: \$5,740,000 **Amount of Leverage:** \$412,000

Leverage as a percent of the Request: 7.18%

DSS + Personnel: \$54,900

As a % of the total request: 0.96%

Easement Stewardship: -

As a % of the Easement Acquisition: -

How will this program accommodate the reduced appropriation recommendation from the original proposed requested amount?

We have reduced accomplishments/costs proportionately across the overall program to accommodate the reduced appropriation. As a result of the reduction, we will be able to protect fewer acres. As in past appropriations, we will focus on the most strategic, highest priority tracts.

Describe and explain leverage source and confirmation of funds:

Leverage is expected from multiple sources, including but not limited to federal sources, land value donations,

contractor donations and PF. Not every source is 100% confirmed at this point. However, PF has an exemplary track record of delivery and over-achievement of match commitments that further stretch OHF funding.

Contracts

What is included in the contracts line?

We anticipate that all of the contract funding will be used for restoration, enhancement and initial development of the protected acres. This could include but is not limited to wetland/grassland restoration, tree removal, prescribed fire, building removal, parking lots, signage, and other development activities.

Travel

Does the amount in the travel line include equipment/vehicle rental?

-

Explain the amount in the travel line outside of traditional travel costs of mileage, food, and lodging

I understand and agree that lodging, meals, and mileage must comply with the current MMB Commissioner Plan:

No

Direct Support Services

How did you determine which portions of the Direct Support Services of your shared support services is direct to this program?

PF utilizes the Total Modified Direct Cost method. This methodology is annually approved by the U.S. Department of Interior's National Business Center as the basis for the organization's Indirect Cost Rate agreement. PF's allowable direct support services cost is 4.12%. In this proposal, PF has discounted its rate to 1.5% of the sum of personnel, contracts, professional services, and travel. We are donating the difference-in-kind.

Federal Funds

Do you anticipate federal funds as a match for this program? Yes

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Are the funds confirmed?

No

What is the approximate date you anticipate receiving confirmation of the federal funds? 07/01/2018

Output Tables

Acres by Resource Type (Table 1)

Type	Wetland	Prairie	Forest	Habitat	Total Acres
Restore	0	0	0	0	0
Protect in Fee with State PILT Liability	175	855	0	0	1,030
Protect in Fee w/o State PILT Liability	0	0	0	0	0
Protect in Easement	0	0	0	0	0
Enhance	0	0	0	0	0
Total	175	855	0	0	1,030

How many of these Prairie acres are Native Prairie? (Table 1b)

Туре	Native Prairie (acres)
Restore	0
Protect in Fee with State PILT Liability	16
Protect in Fee w/o State PILT Liability	0
Protect in Easement	0
Enhance	0
Total	16

Total Requested Funding by Resource Type (Table 2)

Type	Wetland	Prairie	Forest	Habitat	Total Funding
Restore	-	ı	-	ı	-
Protect in Fee with State PILT Liability	\$975,200	\$4,764,800	-	ı	\$5,740,000
Protect in Fee w/o State PILT Liability	-	-	-	-	-
Protect in Easement	-	1	-	1	-
Enhance	-	-	-	-	-
Total	\$975,200	\$4,764,800	-	•	\$5,740,000

Acres within each Ecological Section (Table 3)

Туре	Metro/Urban	Forest/Prairie	SE Forest	Prairie	N. Forest	Total Acres
Restore	0	0	0	0	0	0
Protect in Fee with State PILT Liability	41	165	0	824	0	1,030
Protect in Fee w/o State PILT Liability	0	0	0	0	0	0
Protect in Easement	0	0	0	0	0	0
Enhance	0	0	0	0	0	0
Total	41	165	0	824	0	1,030

Total Requested Funding within each Ecological Section (Table 4)

Туре	Metro/Urban	Forest/Prairie	SE Forest	Prairie	N. Forest	Total Funding
Restore	-	-	-	1	-	-
Protect in Fee with State PILT Liability	\$228,500	\$919,500	-	\$4,592,000	-	\$5,740,000
Protect in Fee w/o State PILT Liability	-	-	-	-	-	-
Protect in Easement	-	-	-	-	-	-
Enhance	-	-	-	-	-	-
Total	\$228,500	\$919,500	-	\$4,592,000	-	\$5,740,000

Average Cost per Acre by Resource Type (Table 5)

Type	Wetland	Prairie	Forest	Habitat
Restore	-	-	-	-

Protect in Fee with State PILT Liability	\$5,572	\$5,572	-	-
Protect in Fee w/o State PILT Liability	-	-	-	-
Protect in Easement	-	-	-	-
Enhance	-	-	-	_

Average Cost per Acre by Ecological Section (Table 6)

Туре	Metro/Urban	Forest/Prairie	SE Forest	Prairie	N. Forest
Restore	-	-	-	-	-
Protect in Fee with State	\$5,573	\$5,572	-	\$5,572	-
PILT Liability					
Protect in Fee w/o State	-	-	-	-	-
PILT Liability					
Protect in Easement	-	-	-	-	-
Enhance	-	-	-	-	-

Target Lake/Stream/River Feet or Miles

Outcomes

Programs in forest-prairie transition region:

• Protected, restored, and enhanced nesting and migratory habitat for waterfowl, upland birds, and species of greatest conservation need ~ *Number of acres of wetlands and uplands protected and restored.*

Programs in metropolitan urbanizing region:

 Protected habitats will hold wetlands and shallow lakes open to public recreation and hunting ~ Number and acres of wetlands protected and restored. Number of acquisitions that provide additional access to existing public lands.

Programs in prairie region:

• Key core parcels are protected for fish, game and other wildlife ~ *Number of new parcels protected. Number of parcels added to existing habitat complexes and resulting percent increase in permanently protected acres of habitat complex.*

Parcels

For restoration and enhancement programs ONLY: Managers may add, delete, and substitute projects on this parcel list based upon need, readiness, cost, opportunity, and/or urgency so long as the substitute parcel/project forwards the constitutional objectives of this program in the Project Scope table of this accomplishment plan. The final accomplishment plan report will include the final parcel list.

Parcel Information

Sign-up Criteria?

No

Explain the process used to identify, prioritize, and select the parcels on your list:

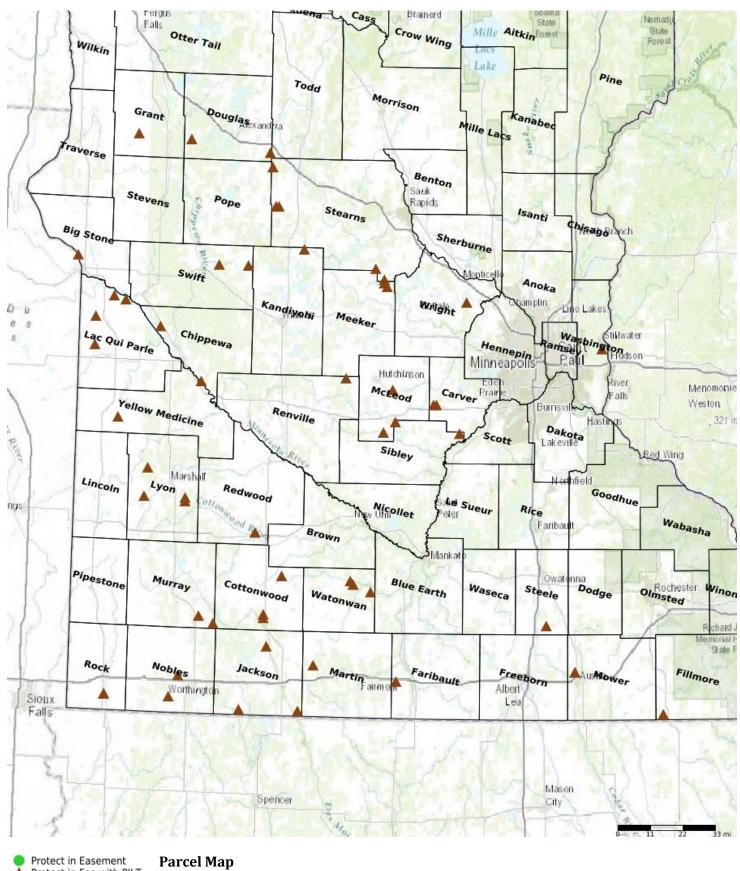
Protect Parcels

Name	County	TRDS	Acres	Est Cost	Existing Protection
LQP T-C51 WMA Addition	Chippewa	11942235	6	\$10,000	No
Spartan WMA Addition	Chippewa	11639218	66	\$360,000	No
Farhagen WMA Addition	Cottonwood	10536211	79	\$457,700	No
Farhagen WMA Addition Tr. 2	Cottonwood	10536214	120	\$900,000	No
Rock Ridge WMA Addition	Cottonwood	10735214	59	\$125,000	Yes
Lake Guckeen WMA Addition	Faribault	10228208	31	\$260,000	No
Beaver Creek WMA Addition	Fillmore	10113228	53	\$120,000	No
Beaver Creek WMA Addition	Fillmore	10113228	320	\$2,200,000	No
Blakesley WMA Addition	Grant	12843233	269	\$900,000	No
Petersburg WMA Addition	Jackson	10134226	116	\$650,000	Yes
Caraway WMA Addition	Jackson	10436225	99	\$800,000	No
Regal Meadows WMA Addition	Kandiyohi	12234201	100	\$500,000	No
Lac Qui Parle WMA Addition	Lac qui Parle	12044226	33	\$131,000	No
NE Four Corners WMA Addition	Lac qui Parle	11845231	86	\$340,000	No
Caerulean WMA Addition	Lac qui Parle	11945219	152	\$650,000	No
LQP L29 WMA Addition	Lac qui Parle	12044219	11	\$21,000	No
Grandview WMA Addition	Lyon	11242219	160	\$1,136,000	No
Amiret WMA Addition	Lyon	11040205	143	\$715,000	No
Prairie Marshes Tr.17 WMA	Lyon	11143236	174	\$870,000	No
Amiret WMA Addition	Lyon	11140232	150	\$700,000	No
Caron WMA Addition	Martin	10333222	142	\$940,000	No
Rich Valley WMA Addition	McLeod	11629224	70	\$425,000	No
Powers Lake WMA	Meeker	12230236	6	\$40,000	No
Kingston WMA Addition	Meeker	12129227	40	\$160,000	No
Kingston WMA Addtition	Meeker	12129221	40	\$180,000	No
Murphy Lake WMA	Mower	10318228	143	\$825,000	No
Murphy Lake WMA	Mower	10318228	143	\$825,000	No
Haberman WMA Addition	Murray	10539218	80	\$450,000	No
Talcot Lake WMA Addition	Murray	10539225	40	\$150,000	No
Herlein Boote WMA Addition	Nobles	10241212	155	\$1,100,000	No
Lamberton WMA Addition	Redwood	10936217	160	\$800,000	No
Boon Lake WMA Addition	Renville	11631205	162	\$1,100,000	No
TBD WMA	Rock	10145211	80	\$960,000	No
TBD WMA	Rock	10145211	40	\$480,000	No
Bob Gehlen WMA Addition	Sibley	11428206	40	\$225,000	No
Faxon WMA Addition	Sibley	11425223	18	\$80,000	No
L. Daniel and Virginia Freenzel WMA	Stearns	12129216	397	\$1,500,000	No
TBD WMA	Stearns	12635207	240	\$1,500,000	No

Mel Roehrl WMA Addition Tr. 4	Stearns	12435205	120	\$500,000	No
Mel Roehrl WMA Addition Tr. 3	Stearns	12435204	160	\$600,000	No
Straight River WMA Addn	Steele	10520223	198	\$625,000	No
Monson WMA Addition	Swift	12237235	15	\$60,000	No
Bench WMA Addition	Swift	12238231	80	\$300,000	No
Younger Brothers WMA Addition	Watonwan	10731222	40	\$200,000	No
Case Lake WMA	Watonwan	10630202	28	\$200,000	No
Younger Brothers WMA Addition	Watonwan	10731226	70	\$325,000	No
Pelican Lake WMA Addition	Wright	12024218	130	\$884,000	No
Upper Antelope Valley WMA Addition	Yellow	11444209	34	\$51,000	No
	Medicine				

Protect Parcels with Buildings

Name	County	TRDS	Acres	Est Cost	Existing Protection	Buildings	Value of Buildings
Thielke Lake WMA	Big Stone	12246230	715	\$1,750,000	Yes	1	\$15,000
Tiger Marsh T7 WMA Addition	Carver	11526208	103	\$650,000	No	4	\$81,000
Tiger Marsh WMA Addition	Carver	11526209	40	\$650,000	No	10	\$125,000
Roy Thompson WMA Addition	Douglas	12740204	240	\$800,000	No	3	\$15,000
Herberger Lake WMA Addition	Douglas	12736224	214	\$1,050,000	No	3	\$10,000
Sioux Valley WMA Addition	Jackson	10137228	21	\$150,000	No	2	-
Spiering WMA Addition	McLeod	11429221	110	\$925,000	No	2	\$0
Ransom Ridge WMA Addition	Nobles	10141209	297	\$1,500,000	No	2	\$0
Bayport WMA Addition	Washington	02920209	194	\$3,500,000	No	10	\$150,000



Protect in Easement
Protect in Fee with PILT
Protect in Fee W/O PILT
Restore
Enhance
Other

Parcel Map
Accelerating the Wildlife Management Area
Program - Phase X
(Data Generated From Parcel List)